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BY

Criminal No.

2:23-cr-4-1-2-3-4

INDICTMENT

Count One

(21 U.S.C. §§ 846, 841(a), and 841(b)(1)(C))

Count Two

On or about October 7, 2021, in the District of Vermont, the defendant [REDACTED]  
[REDACTED] knowingly and intentionally distributed heroin, a Schedule I controlled  
substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C); 18 U.S.C. § 2)

Count Three

On or about May 12, 2022, in the District of Vermont, the defendants [REDACTED]  
[REDACTED], knowingly and intentionally  
distributed fentanyl, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C); 18 U.S.C. § 2)

Count Four

On or about June 2, 2022, in the District of Vermont, the defendant [REDACTED]  
[REDACTED]” knowingly and intentionally distributed cocaine base, a Schedule II  
controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C); 18 U.S.C. § 2)

Count Five

On or about September 29, 2022, in the District of Vermont, the defendant [REDACTED]  
[REDACTED] knowingly and intentionally possessed with the intent to distribute  
heroin, a Schedule I controlled substance, and cocaine base a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C))

Forfeiture Notice

1. The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

2. Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. §§ 841 & 846, the defendants, RONALD HARRIS, aka "Rizz," [REDACTED] shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense. The property to be forfeited includes United States funds in the amount of gross proceeds obtained as a result of the violation.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of this court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(21 U.S.C. § 853)

A TRUE BILL

[REDACTED]  
FOREPERSON

*Nikolas P. Kerest by EAPC*

NIKOLAS P. KEREST (EAPC)  
United States Attorney  
Burlington, Vermont  
January 12, 2023